

James P. Flynn, Esquire  
EPSTEIN BECKER & GREEN, P.C.  
One Gateway Center  
Newark, NJ 07102  
(973) 642-1900 (phone)  
(973) 642-0099 (fax)  
*Counsel for Novartis Pharmaceuticals Corporation*

Russell Beck, Esquire  
Stephen D. Riden, Esquire  
BECK REED RIDEN LLP  
155 Federal Street, Suite 1302  
Boston, MA 02110  
(617) 500-8660 (phone)  
(617) 500-8665 (fax)  
*Of Counsel for Novartis Pharmaceuticals Corporation (Pro Hac Vice Pending)*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

NOVARTIS PHARMACEUTICALS  
CORPORATION,

Plaintiff,

v.

ALISHA ALAIMO,

Defendant.

Civil Action No.: \_\_\_\_\_

**DECLARATION OF THOMAS PERRELLA**

I, Thomas Perrella, affirm as follows:

1. My name is Thomas Perrella. I am over the age of 18. All statements of fact made herein are based on my personal knowledge, or, where indicated, based on my investigation, in which case I believe them to be true.

2. I make this declaration on behalf of Novartis Pharmaceuticals Corporation (“Novartis”), a Delaware corporation with its principal place of business in East Hanover, New Jersey in support of its emergency motion for order to show cause with temporary restraints.

3. I am a VIP Support Specialist employed by Novartis Services, Inc. In that role, I provide IT services to Novartis’ Executive Committee members and Global Leadership.

4. I understand that Alisha Alaimo (“Alaimo”) returned her Novartis-issued iPhone and iPad (the “Apple devices”) to Caryn Parlavecchio on June 9, 2017, who arranged for them to be returned as part of the normal asset recovery procedures. I further understand that both devices were factory reset and wiped of all information.

5. My team does not factory reset or otherwise wipe information off of any Novartis devices (unless by accident).

6. Although I spoke to Alaimo about some other technology related issues in connection with her departure, no one on my team, including me, factory reset or wiped, or assisted Alaimo to factory reset or wipe, the Apple Devices.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 7<sup>th</sup> day of August 2017 at 9:13 AM, New Jersey.

  
Thomas Perrella